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Attorneys for Defendant  
Facebook, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SIX4THREE, LLC,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

Case No. 3:17-cv-00359-WHA

**DECLARATION OF SONAL N. MEHTA IN  
SUPPORT OF DEFENDANT FACEBOOK,  
INC.'S OPPOSITION TO PLAINTIFF  
SIX4THREE, LLC'S MOTION TO REMAND**

Date: February 16, 2017  
Time: 8:00 a.m.  
Ctroom: 8, 19th Floor  
Judge: Honorable William Alsup

1 I, Sonal N. Mehta, declare as follows:

2 1. I am an attorney with the law firm Durie Tangri LLP, counsel for Defendant Facebook,  
3 Inc. ("Facebook") in the above-captioned matter. I have personal knowledge of the facts set forth herein,  
4 and if called upon to testify, I could and would testify to the statements made herein.

5 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from Plaintiff  
6 Six4Three, LLC's Verified Third Supplemental Response to Defendant Facebook, Inc.'s Special  
7 Interrogatories, served on December 27, 2016.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Complaint for Declaratory  
9 Judgment and Injunctive Relief of Plaintiff, Six4Three, LLC, Case No. 3:16-cv-06716-JCS (N.D. Cal.),  
10 filed on November 21, 2016.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of email correspondence from  
12 Facebook's Counsel to Six4Three, LLC's Counsel, dated January 20, 2017. Six4Three did not respond  
13 to this email.  
14

15 5. In litigating this case in state court, Facebook filed demurrers to Six4Three's original  
16 complaint, First Amended Complaint, and Second Amended Complaint; engaged in written discovery  
17 and document production, including producing more than 800,000 pages of documents; took the  
18 depositions of two Six4Three witnesses; and was prepared to move for summary judgment.  
19

20 I declare under the penalty of perjury that the foregoing is true and correct. Executed on February  
21 6, 2017 in San Francisco, California.  
22

23 \_\_\_\_\_  
24 /s/ Sonal. N. Mehta  
25 SONAL N. MEHTA  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2017 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

*/s/ Sonal N. Mehta*  
SONAL N. MEHTA